SILVERMAN & ASSOCIATES | ATTORNEYS AT LAW

March 10, 2017

VIA ECF FILING

Clerk of the Court
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Request to Deem Three Cases as Related:

L.G. v. Long Beach CSD, et al.
Docket No.: 17 CV 00453

Greengus v. Long Beach CSD, et al.
Docket No.: 16 CV 01955 (SJF)(AYS)

Weitzman v. Long Beach CSD, et al.
Docket No.: 16 CV 3544 (SJF)(SIL)

Dear Clerk of the Court:

We represent the defendants, the Long Beach City School District, Sabrina Cantore, Vincent Russo, Dr. Randie Berger, Dr. Michele Natali, and David Weiss in the *L.G.* matter, the Long Beach City School District, Sabrina Cantore, Vincent Russo, Dr. Randie Berger, Dr. Michele Natali, and David Weiss in the *Greengus* matter, and the Long Beach City School District, Sabrina Cantore, Randie Berger, Vincent Russo, Amy Teemer, Kristen Pipitone, Raquel Lopez, Dana D'Alessio, and David Weiss in the *Weitzman* matter, all captioned above. This letter is to follow up on our previous request, where we indicated on our Notice of Removal's Civil Cover Sheet filed January 27, 2017, that the *L.G.* case was related to the *Greengus* and *Weitzman* cases, both currently before the Hon. Judge Feuerstein.

Eastern District of New York Local Civil Rule 50.3.1(a) provides that a:

> "civil case is 'related' to another civil case . . . when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge."

The standard that must be met to establish that cases are related is set forth in Local Civil Rule 50.3.1(d), which provides that cases can be judicially deemed related when:

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> "the standard of paragraph (a) is met, i.e., that because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge."

Here, the standard of Rule 50.3.1 is met because of the cases' shared facts and legal issues and because the cases all arise from the same transactions or events, and because a substantial saving of judicial resources is therefore likely to result from treating them as related. Specifically, the *L.G.* and *Greengus* cases involve essentially identical claims, that plaintiffs' children were abused by a District employee, while the *Weitzman* case alleges that the defendants defamed plaintiff and falsely accused plaintiff of the abuse alleged in the *L.G.* and *Greengus* cases.

Based on the above, we respectfully request a judicial determination that the *L.G.* case captioned above, is related to the other above captioned matters and assigned to the Hon. Judge Feuerstein. Thank you for your consideration of this matter.

Respectfully yours,

SILVERMAN & ASSOCIATES

Lewis R. Silverman

cc: **VIA ECF**

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